Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
Petitions Seeking Support for	)	**CC Docket No. 02-6; WC Docket 10-90;**
		WC Docket No. 13-184
Off-campus Internet Access	)	

COMMENTS
OF
Sharyland ISD

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Goal:

The goal of both petitions being considered by the FCC is to help close what Commissioner Jessica Rosenworcel has coined the "homework gap" — the inability of students, particularly those from low-income families, to access increasingly necessary broadband Internet services outside of their schools. Sharyland ISD is in support of these petitions. We propose that the e-rate program permit at home and other off-campus use without a reduction in E-rate funding.

Executive Summary

Sharyland ISD lies along the Texas-Mexico international border in Hidalgo County. The geographic location of the Sharyland ISD area lends itself to serving a diverse and unique student population compared to other areas of the state. We're a premiere school district in South Texas with 10,200 students, three high schools, two jr. highs, and eight elementary campus.

With that said we do have pockets of economically disadvantaged students. Nearly 60% attend our school district. We have families with dirt floors in very poor living conditions. Technology use isn't a priority for them. Providing for their families and just trying to make it day to day is an ongoing battle for these families.

The digital divide is evident. We strive to make technology available for our kids when at school, but with the lack of connectivity at home it becomes difficult to make it fair for all.

While this paper is a discussion on allowable technology and funding issues in the K-12 environment, let us not forget that the knowledge and skills a K-12 student learns today is the basis for a college education or employment in the increasingly technological workplace. Many colleges and universities have moved to digital textbooks and the use of laptops/tablets for instruction. Many offer on-line courses for specific subjects that are Internet based and cannot be attended other than through the Internet. Our students must be prepared to enter this arena with knowledge that allows them to effectively use technology as an educational and workplace tool.

Many mobile device initiatives in the Rio Grande Valley would not be possible if not for E-Rate. With increased devices on the network comes the need for increased bandwidth. Many if not all districts in the Rio Grande Valley would not be able to afford the bandwidth needed to support

such devices on the network. Lack of broadband access disproportionately affects low- and moderate-income (LMI) communities. Households in the U.S. making $25,000 or less have a broadband adoption rate of 47 percent, while those making more than $100,000 have an adoption rate of 92 percent.

"Like electricity a century ago, broadband is a foundation for economic growth, job creation, global competitiveness and a better way of life. It is enabling entire new industries and unlocking vast new possibilities for existing ones. It is changing how we educate children, deliver health care, manage energy, ensure public safety, engage government, and access, organize and disseminate knowledge."[5] — Federal Communications Commission (FCC)

Education and the Homework Gap. Access and skill in using the internet effectively have become essential for educational and economic opportunity. It is reported by the Census Bureau that education and broadband adoption are positively related, meaning that households with less educational attainment have lower rates of broadband adoption. Only 43 percent of individuals without a high school diploma use the internet, compared with 90 percent for those with a college degree. Thus, to provide a curriculum that is relevant and prepares students for the job market, teachers are increasingly assigning homework that requires internet access. Low-income students are at a distinct disadvantage. It is common to hear stories of students doing their homework in fast-food restaurants or outside of school buildings after hours to access free Wi-Fi hot spots. Eighty-four percent of the nation's K–12 teachers report the digital divide is growing in their classrooms due to unequal access to essential learning technology resources at home. Roughly one-third (31.4 percent) of households whose incomes fall below $50,000 and with children ages 6 to 17 do not have a high speed internet connection at home. This low-income group makes up about 40 percent of all families with school-age children in the United States. … By comparison, only 8.4 percent of households with annual incomes over $50,000 lack a broadband internet connection at home. In other words, low-income homes with children are four times more likely to be without broadband than their middle or upper-income counterparts." This is referred to as the "homework gap.

The Federal Communications Commission has approved an expansion of the **federal Lifeline program to include subsidies for broadband service for low-income households**, a move that could help bridge the digital divide that exists between disadvantaged students and their wealthier peers. Education and civil rights groups hailed the plan as a critical step toward closing the so-called "homework gap," experienced by children who struggle to complete online assignments because they have inadequate or nonexistent Internet access at home.

One in 5 Americans currently lack broadband access at home, and the vast majority of those who remain disconnected are poor. At the same time, however, schools are going increasingly digital, with surveys indicating that 7 in 10 teachers now assign homework online. Home broadband access is also viewed as increasingly essential for job searches, accessing public services, and participating in civic life.

Although schools in the Sharyland ISD have benefitted greatly from the E-rate program, the ever changing technology and academic requirements require upgrades to maintain and expand the current networks. This requires an ongoing economic support system to be in place such as E-rate funding.

Why should this proposed use of off-campus internet access be allowed? How would it benefit our students?

1. Connections would comply with the Children's Internet Protection Act (CIPA) and would not require additional E-Rate funding.

2. Partnerships with local and other partners, not the E-Rate program, would pay the incremental costs associated with connecting the housing complexes to the existing E-Rate subsidized network. This would ensure that students have access to Internet connections at home to complete online homework, increasing the efficiency of already existing school bandwidth, and streamlining the application process for E-rate funds—all without any additional costs to the [universal service fund].

3. There are certain off-site activities that are integral, immediate, and proximate to the education of students, and therefore can be funded under the E-rate program because they serve an educational purpose. This off-campus use of internet would benefit students and schools by (1) allowing students to access digital content, services, and school-related files on a school network in the evenings and over the weekend; (2) permitting school-owned devices used outside of school to take advantage of school network content filtering; and (3) giving schools the ability to track student preferences for educational resources and give insights into individual student experiences with online educational content.

4. At Sharyland ISD we offer a wide variety of resources to our students (via credential authentication). Some of these include:

    a. Students would have access to district -sponsored resources such as email to communicate with teachers.
    b. Microsoft productivity tools available via Office 365 which would assist them in completing homework and other assignments.
    c. Students have access to a wide variety of resources to assist them in getting college ready. However, they do not have adequate time during the school day to take full advantage of such resources. Allowing at home access to the internet would greatly improve the use of these college readiness resources.
    d. Research tools on careers and higher education possibilities. Includes tests for certification in a number of vocations along with career planning tools and test-taking strategies.
    e. Access to CIPA complaint Internet

Eligible Services Considerations

The following services should be E-rate eligible:

1. Privately owned WAN fiber should be E-rate eligible.
2. Content filters are required and therefore should be E-rate eligible.
3. To reach the goal of universal broadband access by students and educators, we recommend the E-rate funding be provided for ensuring easy access to robust broadband connectivity outside of schools including, but not limited to, the home and such publicly accessible institutions as libraries and community centers. (ie: wireless on school buses)

Submitted Respectfully,
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